

UNITED STATES DISTRICT COURT

for the

Southern District of New York

14 MAG 819

United States of America

v.

JULIA VOLKMAN

Case No.

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) JULIA VOLKMAN

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Wire Fraud, in violation of Title 18, United States Code, Sections 1343 & (2).

Date: APR 18 2014

City and state: _____

Issuing officer's signature

United States Magistrate Judge

Southern District of New York
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

14 MAG 819

Approved: _____

Jason Wong
Special Assistant United States Attorney

Before: _____

HONORABLE HENRY B. PITMAN
United States Magistrate Judge
Southern District of New York

----- x

UNITED STATES OF AMERICA :

SEALED
COMPLAINT

-v- :

Violations of 18 U.S.C. §
1343 and 2

JULIA VOLKMAN, :

Defendant. :

COUNTY OF OFFENSE:
NEW YORK

----- x

SOUTHERN DISTRICT OF NEW YORK, ss.:

JUSTIN KITTELSTAD, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") and charges:

COUNT ONE
(Wire Fraud)

1. From on or about November 29, 2012, through on or about December 27, 2013, in the Southern District of New York and elsewhere, JULIA VOLKMAN, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, to wit, VOLKMAN caused approximately \$121,300 to be wired from another individual's bank account in Manhattan, without authorization, to Volkman's personal bank account in Wisconsin.

(Title 18, United States Code, Sections 1343 and 2).

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), currently assigned to investigate international money laundering and other white collar crimes as part of the El Dorado Task Force in the New York Office. I have been a Special Agent for approximately five and a half years.

3. This affidavit is based upon my investigation, which included the review of bank and financial records, as well as interviews with witnesses and other law enforcement officials. Because this affidavit is submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have obtained over the course of the investigation, which is ongoing. Where the contents, actions, statements or conversations with others are reported herein, they are reported in substance or in part unless otherwise indicated. In addition, the monetary amounts are approximate and reflect only the data collected and analyzed to date.

4. I have been investigating the reported theft of funds from a trust account held at a securities firm in Manhattan ("Firm-1"). From speaking with a representative of Firm-1 who works in Firm-1's compliance department, I learned the following:

a. In or about March 2014, a Firm-1 Broker ("Broker-1") in Wisconsin contacted the compliance department to report that Broker-1 had been contacted by a client ("Victim-1") who raised questions about certain activity in Victim-1's Firm-1 account.

b. Thereafter, Broker-1 reviewed records of Victim-1's Firm-1 account and discovered a series of wire transfers out of the account that Broker-1 did not recognize and believed may have been made without Victim-1's authorization (the "Unauthorized Transfers").

c. Broker-1 discussed the Unauthorized Transfers with Victim-1, who confirmed that they were unauthorized by Victim-1.

d. Julia Volkman, the defendant, was employed as the executive assistant to Broker-1 for approximately ten years until she quit in or about April 2014.

5. From reviewing records of Firm-1, I learned in sum and substance the following:

a. Between approximately November 29, 2012, and December 27, 2013, the Unauthorized Transfers were made out of Victim-1's account at Firm-1 in an amount totaling approximately \$121,300.

b. The Unauthorized Transfers were made by wire from Victim-1's account in Firm-1 in Manhattan to particular bank accounts in Wisconsin ("the Volkman Accounts").

c. The Unauthorized Transfers from Victim-1's Firm-1 account to the Volkman Accounts were made pursuant to "Letters of Instruction" to Firm-1, which purportedly bore the signature of Victim-1, and were emailed from the Firm-1 email address of Julia Volkman, the defendant.

6. I have reviewed records of the Volkman Accounts at a particular bank ("Bank-1") and spoke with Bank-1 representatives, and from the sources I have learned the following:

a. Volkman is the sole signatory of the Volkman Accounts.

b. All of the Unauthorized Transfers totaling approximately \$121,300 were received into the Volkman Accounts and thereafter a substantial portion of the funds were used to make purchases at various retailers as well as to pay for other goods and services.


7. I have spoken to Victim-1 in the course of this investigation. From speaking with Victim-1, I have learned that Victim-1 did not authorize any transfers into the Volkman Accounts.

WHEREFORE, deponent prays that JULIA VOLKMAN, the defendant,
be arrested, imprisoned or bailed as the case may be.



JUSTIN KITTELSTAD
Special Agent
Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
18th day of April, 2014



THE HONORABLE HENRY B. PITMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

FRANK MAAS
United States Magistrate Judge
Southern District of New York

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Court at New York, New York, this 1st day of January, 2014.

[Signature]

CLERK OF COURT

IN SENATE CHAMBERS

NEW YORK, NEW YORK

RECEIVED
JAN 1 2014
CLERK OF COURT
IN SENATE CHAMBERS
NEW YORK, NEW YORK

